



JOINT MEETING OF THE

REGIONAL/SUBREGIONAL TASK FORCE/POLICY COMMITTEE REPS/P & P TAC REPS

Main Office

818 West Seventh Street
12th Floor
Los Angeles, California
90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

Officers: President: Yvonne B. Burke, Los Angeles County • First Vice President: Gary Ovitt, San Bernardino County • Second Vice President: Richard Dixon, Lake Forest • Immediate Past President: Toni Young, Port Hueneme

Imperial County: Victor Carrillo, Imperial County • Jon Edney, El Centro

Los Angeles County: Yvonne B. Burke, Los Angeles County • Zev Yaroslavsky, Los Angeles County • Jim Aldinger, Manhattan Beach • Harry Baldwin, San Gabriel • Paul Bowlen, Cerritos • Todd Campbell, Burbank • Tony Cardenas, Los Angeles • Stan Carroll, La Habra Heights • Margaret Clark, Rosemead • Gene Daniels, Paramount • Mike Dispenza, Palmdale • Judy Dunlap, Inglewood • Rae Gabelich, Long Beach • David Gafin, Downey • Eric Garcetti, Los Angeles • Wendy Greuel, Los Angeles • Frank Gurulé, Cudahy • Janice Hahn, Los Angeles • Isadore Hall, Compton • Keith W. Hanks, Azusa • José Huizar, Los Angeles • Tom LaBonge, Los Angeles • Paula Lantz, Pomona • Paul Nowatka, Torrance • Pam O'Connor, Santa Monica • Alex Padilla, Los Angeles • Bernard Parks, Los Angeles • Jan Perry, Los Angeles • Ed Reyes, Los Angeles • Bill Rosendahl, Los Angeles • Greig Smith, Los Angeles • Tom Sykes, Walnut • Paul Talbot, Alhambra • Mike Ten, South Pasadena • Tonia Reyes Uranga, Long Beach • Antonio Villaraigosa, Los Angeles • Dennis Washburn, Calabasas • Jack Weiss, Los Angeles • Herb J. Wesson, Jr., Los Angeles • Dennis Zine, Los Angeles

Orange County: Chris Norby, Orange County • Christine Barnes, La Palma • John Beauman, Brea • Lou Bone, Tustin • Art Brown, Buena Park • Richard Chavez, Anaheim • Debbie Cook, Huntington Beach • Leslie Daigle, Newport Beach • Richard Dixon, Lake Forest • Paul Glaab, Laguna Niguel • Marilyn Poe, Los Alamitos

Riverside County: Jeff Stone, Riverside County • Thomas Buckley, Lake Elsinore • Bonnie Flickinger, Moreno Valley • Ron Loveridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

San Bernardino County: Gary Ovitt, San Bernardino County • Lawrence Dale, Barstow • Paul Eaton, Montclair • Lee Ann Garcia, Grand Terrace • Tim Jasper, Town of Apple Valley • Larry McCallon, Highland • Deborah Robertson, Rialto • Alan Wapner, Ontario

Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

Orange County Transportation Authority: Lou Correa, County of Orange

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Keith Millhouse, Moorpark

**Thursday, June 15, 2006
12:00 Noon - 2:00 p.m.**

**Southern California Association of
Governments—San Bernardino A & B
818 W. 7th Street, 12th Floor
Los Angeles, CA 90017
213.236.1800**

If members of the public wish to review the attachments or have any questions on any of the agenda items, please contact Deby Salcido at 213.236.1993 or salcido@scag.ca.gov

SCAG, in accordance with the Americans with Disabilities ACT (ADA), will accommodate persons who require a modification of accommodation in order to participate in this meeting. If you require such assistance, please contact SCAG at (213) 236-1868 at least 72 hours in advance of the meeting to enable SCAG to make reasonable arrangements. To request documents related to this document in an alternative format, please contact (213) 236-1868.

AGENDA

*“Any item listed on the agenda (action or information)
may be acted upon at the discretion of the Committee”.*

1.0 CALL TO ORDER

2.0 PUBLIC COMMENT PERIOD

Members of the public desiring to speak on an agenda item or items not on the agenda, but within the purview of the Committee, must fill out and present a speaker's card to the Assistant prior to speaking. A speaker's card must be turned in before the meeting is called to order. Comments will be limited to three minutes. The chair may limit the total time for all comments to twenty (20) minutes.

3.0 ACTION ITEMS

- | | | | |
|-----|--|---|-----------|
| 3.1 | <u>Regional Housing Needs Assessment</u> <u>(RHNA) Pilot Program Attachment</u> | Hasan Ikhrata SCAG Staff | 01 |
|-----|--|---|-----------|

At the June 1, 2006 Regional Council meeting, the draft RHNA Pilot Program was referred to a joint meeting for review and comment. This program proposal outlines an alternative approach to completing SCAG's RHNA responsibilities for the upcoming RHNA cycle. This approach requires legislative change before SCAG may proceed. A White Paper on the proposed approach is attached.

Recommended Action: Recommend that the Regional Council approve, at their July 6, 2006 meeting, the RHNA Pilot Program and pursue a legislative strategy to amend State housing law before the end of the 2006 legislative session.

4.0 ADJOURNMENT

REPORT

DATE: June 15, 2006

TO: Regional/Subregional Task Force
Policy Committee Member representatives
P & P TAC Member Representatives

FROM: Hasan Ikhata, Director, Planning and Policy 213 236 1944 Ikhata@scag.ca.gov

SUBJECT: Joint Meeting on Regional Housing Needs Assessment (RHNA) Pilot Program

EXECUTIVE DIRECTOR'S APPROVAL:

RECOMMENDED ACTION:

Recommend that the Regional Council approve, at their July 6, 2006 meeting, the RHNA Pilot Program and pursue a legislative strategy to amend State Housing Law before the end of the 2006 legislative session.

SUMMARY:

If the Pilot Program is not approved then the following action will be required:

Implementation of a RHNA under the existing law, and identify funding of a minimum of one million dollars from various sources including SCAG General Fund or from a RHNA fee or a combination of both.

A White Paper is attached to this memo that explores various subjects regarding this item. Included is the draft language for the Pilot Program as revised according to input and comments received to date. The White paper includes:

- A detailed description of the draft RHNA Pilot Program
- A discussion of the funding issues related to completion of a RHNA
- The status of SCAG's efforts to obtain an extension to the RHNA
- The legislative calendar and the importance of the July deadline

BACKGROUND:

At the conclusion of the last RHNA cycle's litigation, SCAG signed a Settlement Agreement that agreed to, in part, "Commit to a process in future RHNA cycles whereby the entire RHNA process is completed within time frames set forth in Article 10.6 of the Government Code" and "Agree to support legislative initiatives that call for local governments and regions to plan for a 20 year site inventory, based on natural increases in population and job growth, and which allow neighboring jurisdictions by agreement to share responsibilities for increasing the housing supply". (REF:: #2. (c) and (e) Settlement Agreement dated 9-24-04).

Since then, the Regional Council and Community, Economic and Human Development (CEHD) Committee have been informed of, and given feedback for, staff participation at several Housing Element Reform and CEQA Reform statewide working groups from the technical to the Executive levels. When it became obvious that no Housing law reforms were to be forthcoming in time for the next RHNA cycle, SCAG initiated a Pilot Program under guidance from the CEHD Policy Committee. This Pilot Program allows

REPORT

SCAG to complete the next RHNA cycle; as we agreed and refocuses housing planning efforts in Southern California to be policy based and integrated with regional planning; as we agreed.

The development and review of Draft RHNA Pilot Program has been extensive. Concept discussions and distributions of preliminary drafts have taken place over a period of time. The program presented for action at today's Joint Meeting is the result of this review process. A partial listing of the meetings held includes:

| | |
|------------------|--|
| February 2, 2006 | CEHD Action Item |
| April 6, 2006 | Joint Meeting Regional Council and Policy Committees |
| April 24, 2006 | Joint Meeting Regional Council and Policy Committees |
| May 1, 2006 | Joint Meeting Regional Council and Policy Committees |
| May 4, 2006 | CEHD Action Item |
| May 11, 2006 | VCOG Board Meeting |
| May 18, 2006 | Planning and Policy Technical Advisory Committee |
| May 25, 2006 | Sub regional Coordinators meeting |
| May 25, 2006 | OCCOG Board meeting presentation and discussion |
| May 31, 2006 | CVAG/ American Planning Association Chapter Meeting |
| May 30, 2006 | Pilot Program briefing to HCD, CSAC and other housing stakeholders |
| June 1, 2006 | Retreat action item continued to July 6, 2006 |
| June 1, 2006 | CEHD Discussion |
| June 2, 2006 | Retreat Discussion |
| June 15, 2006 | Joint Meeting Regional/Subregional task Force, TAC and Policy Committees |

**A Regional Housing Needs Assessment
Pilot Program
for Southern California**

June 2006

Table of Contents

| | |
|--|----|
| Introducing a New approach to RHNA..... | 3 |
| Draft RHNA Pilot Program Principles..... | 4 |
| <i>Table 1: Local Growth Forecast/RHNA Update Process</i> | 5 |
| Schedule and Timeline..... | 9 |
| <i>Table 2: Exiting Regional Housing Needs Assessment Statute and Proposed Regional Housing Needs Assessment Pilot Program “Draft” Schedule and Timeline</i> | 9 |
| Funding RHNA..... | 10 |
| RHNA Funding Options..... | 12 |
| Appendix A: Regional Housing Needs Assessment Pilot Program Fact Sheet..... | 13 |

Introducing a New Approach to RHNA

The proposed framework is designed to help resolve policy issues through a growth framework based on compass growth visioning principles and AB 2158 local government survey factors as a starting point. It streamlines requirements, reduces paperwork and program cost, promotes incentives to do more than the minimum and ties together the 20 year growth forecast for transportation, air quality and housing planning in ways not envisioned in the 2004 Housing Element reform of the RHNA process. It also promotes increased local government flexibility in meeting housing allocation goals by allowing trading, transfers and cooperative planning.

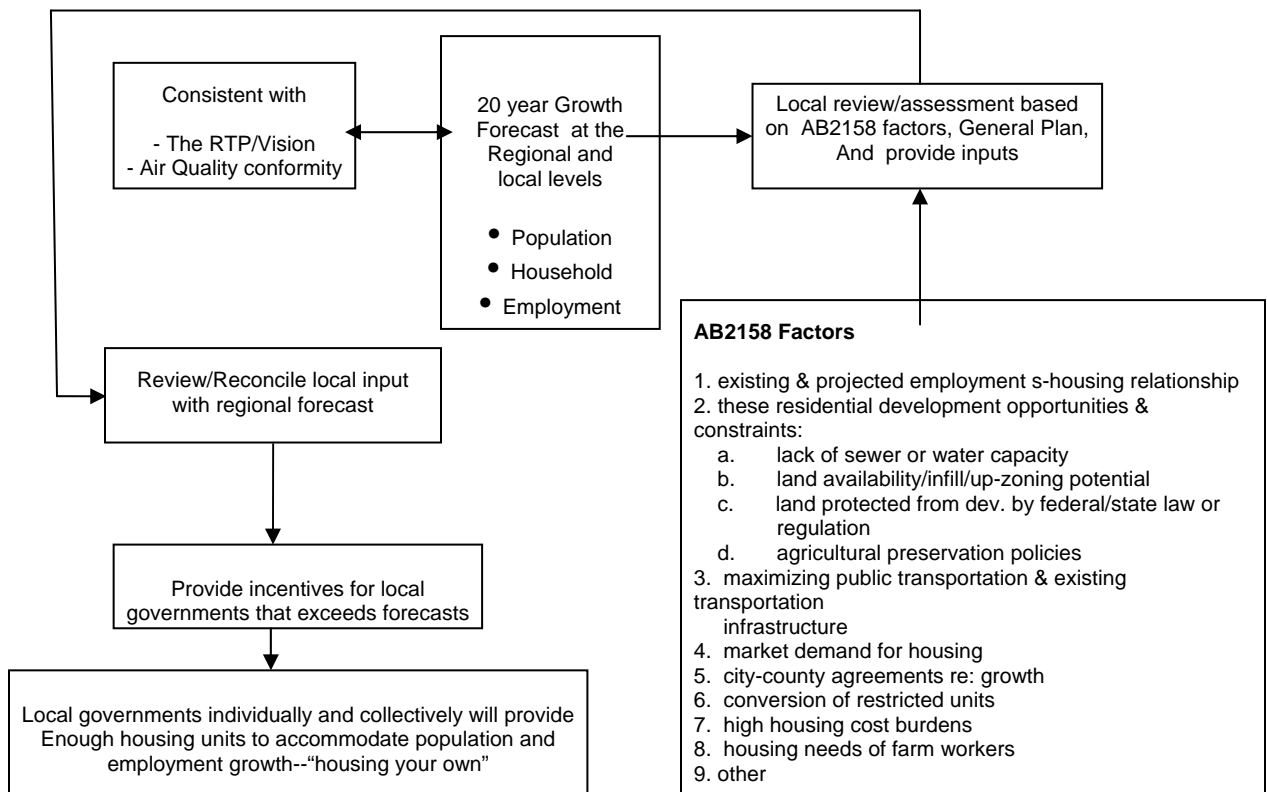
Draft RHNA Pilot Program Principles

In lieu of the provisions of Government Code sections relating to the regional housing needs process, the Southern California Association of Governments, shall prepare the fourth revision of the Housing Element Regional Housing Needs Assessment in accordance with the following;

- (1) SCAG shall develop a minimum 20 year growth forecasts, by 5-year increment.
- (2) The forecasts shall include three major variables: population, employment, and households, and by various geographic areas.
- (3) SCAG shall work to convert the households into housing units using replacement rates from the Department of Finance (DOF) and county level vacancy rates from the most recent Census by weighing vacancy rates of for-sale and for-rent units from both owner and rental units.
- (4) The methodology and allocation process shall follow the Regional Transportation Plan (RTP) Growth Forecasting Process, build upon subregion/local jurisdiction growth perspectives and consensus, which eventually leads toward a growth forecast and distribution consistent with the principles of the Regional Compass/Blueprint.
- (5) To ensure that above objectives can be accomplished, the following steps will be carried out early on during the growth forecasting process (see Table 1):
 - a. *Engage growth forecasting and allocation process to consider the 2158 factors listed under the Government Code Section 65584.04(d), which are as follows:*
 - i. *Existing and projected employment s-housing relationship*
 - ii. *Residential development opportunities and constraints:*
 - *Lack of sewer or water capacity*
 - *Land availability/infill/up-zoning potential*
 - *Land protected from development by federal/state law or regulation*
 - *Agricultural preservation policies*

- iii. *Maximizing public transportation and existing transportation infrastructure*
- iv. *Market demand for housing*
- v. *City-county agreements regarding growth*
- vi. *Conversion of restricted units*
- vii. *High housing cost burdens*
- viii. *Housing needs of farm workers*
- ix. *Other*

Table 1: Local Growth Forecast/ RHNA Update Process



(6) SCAG shall conduct a minimum of one public workshop for each subregion to provide the opportunity for public involvement.

- (7) The SCAG Regional Council shall approve the forecasts, and transmit to the State Housing and Community Development Department (HCD) at the regional level the following variables: population, households, and housing units.
- (8) If the difference between SCAG's population projection and the one projected by the DOF is over 4 percent, the Department will convene a Panel consisting of representatives from Department of Finance (DOF), Employment Development Department (EDD), Caltrans and a representative of another Council Of Government (COG) to review the assumptions and methodology of the forecast and to recommend to the Department whether or not the household forecasts and assumptions are consistent with this section or require modifications.
- (9) After reviewing the recommendations of the review panel and consulting with SCAG, the Department shall certify the SCAG forecast, certify the forecast determined by the review panel, or propose an alternative regional housing need with a written explanation for its proposal. If the Department proposes an alternative regional housing need that is not acceptable to the SCAG, the parties shall submit the matter to arbitration by an academic demographer appointed by the Department of Finance within 30 days. Within 45 days, the arbitrator shall meet with the parties, review all relevant data, and determine a final regional housing need which shall carry a presumption of validity in any court action. Any challenge to the determination of the arbitrator shall be made within 30 days.
- (10) SCAG shall follow the Regional Transportation Plan (RTP) Growth Forecasting process, build upon subregion/local jurisdiction growth perspectives and consensus and complete the Housing Need Allocation Plan twelve (12) months from the date that the Department sends notice of the validation of the SCAG forecasts.
- (11) SCAG Regional Council and Policy Committees shall appoint and work with appropriate subcommittees and technical advisory committees to establish a public review process to discuss, debate, and reach consensus on various policy issues that ultimately will determine key methodologies required to complete

the Regional Housing Allocation Plan. In addition to those “2158 factors” listed under (5)(b), including but not limited to

- a. Appropriate factors in determining housing unit allocation by local jurisdiction,
- b. Appropriate factors in determining housing unit allocation by income,
- c. Appropriate level of resources for producing affordable housing,
- d. Appropriate level of incentives or regulatory relief for land use strategies and designations consistent with the regional growth forecast
- e. Principles of trade and transfer.

(12) The Housing Need Allocation Plan shall allocate a lower allocation of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category.

(13) SCAG, and/or the subregional entity, as appropriate, shall conduct a minimum one public workshop for each subregion to further provide the opportunity for public involvement and comment on the housing need allocation plan

(14) Local jurisdictions shall review and comment on the Housing Need Allocation Plan based on evaluating the factors listed in item (5).

(15) SCAG shall respond at the conclusion of the local jurisdictional review by facilitating a trading process.

(16) The principles and criteria for trade and transfer include:

- a. The trading is authorized between willing jurisdictions within a well-defined commuting shed as can be defined with statistics from the 2000 Census Transportation Planning Package.*
- b. The trade and transfer will not adversely impact the mobility and air quality.*
- c. The trade and transfer will not further impact on the concentration of low income households and housing units.*
- d. SCAG, to the extent of possible, shall attempt through its regional planning efforts, to pool and target resources in the form of infrastructure investment and regulatory relief to facilitate and support*

the trade and transfer efforts that are deemed consistent with the adopted Regional Compass/Blueprint principles.

e. SCAG will work to allocate discretionary state and regional dollars to incentivize trading.

- (17) The detail trading policies and process shall be developed by SCAG, appropriate Technical Committees, subregions/local jurisdictions, and others, and adopted by RC within 180 days from the effective date of this section.
- (18) The Regional Council of SCAG shall approve the Housing Need Allocation Plan and provide for a public review period of not less than ninety (90) days nor more than (120) one-hundred and twenty days for consideration of trades and transfers of need share between two or more jurisdictions region wide requesting same.
- (19) SCAG shall issue written findings at the conclusion of the trades and transfers public review period summarizing the requests made and any changes made to the Regional Need Allocation Plan as a result of the review that will not significantly impact mobility and air quality, and are consistent with the goals and intent of this section. These trades and certification shall occur prior to the adoption of the final allocation and shall not exacerbate current disproportionate shares of population by income category.
- (20) The SCAG Regional Council shall approve the final Regional Housing Need Allocation Plan with findings that the Plan is consistent with the objectives of this section, consistent with the Regional Transportation Plan and submit it to the Department.
- (21) SCAG shall delegate development of the Housing Need Allocation Plan, consistent with Section 65584.01(e)(6) through (10) to subregional entities, provided the subregional entity agrees to maintain the subregional total of housing need throughout the process and submits the final Regional Housing Need Allocation Plan for inclusion in the region-wide Housing Need Allocation Plan.

Schedule and Timeline

The schedule and milestones of the proposed Pilot RHNA program and the existing deadlines in housing law are provided here for comparison. If the RHNA Pilot Program is signed into law, the RHNA adoption date would be the same under the Pilot Program as it is under existing statute. Nevertheless funding issues may impact the proposed timelines as implementing a RHNA fee may be difficult to achieve.

**Table 2: Existing Regional Housing Needs Assessment Statute
and
Proposed Regional Housing Needs Assessment Pilot Program
“Draft” Schedule and Timeline**

| | Existing Statute ¹ | Pilot ² |
|---|-------------------------------|---------------------|
| Planning Period | 2008-2014 | 2008-2030 |
| | RTP/RHNA | RTP/Compass/RHNA |
| Consultation | Nov 1, 2005 | |
| Local Survey | Jan 1, 2006 | |
| Formation of Subregional Delegation | Mar 1, 2006 | |
| Determine Statewide Need | May 1, 2006 | Jun 2006 |
| Subregional Delegation, Local Review Workshops, Pursue Legislation Change | | Jul 2006 |
| Draft Allocation Method | Jun 30, 2006 | |
| Draft Local Allocation | | Dec 2006 |
| Workshops/Comments, Appeals/Provisions, Determinations | Sept 1, 2006 | |
| Policy Discussion, Fair Share/Blueprint/ Allocation by Income | | Sept - Dec 2006 |
| Adoption of Final Methodology | Oct 1, 2006 | Jan 2007 |
| Trade and Transfer | Nov 15, 2007 - Jun 30, 2008 | Jan 2007 - Jun 2007 |
| Draft RHNA | Jan 1, 2007 | |
| Revise Local Share | Mar 1, 2007 | |
| Determination of Revision | Mar 1, 2007 | |
| RHNA Adoption | Jul 1, 2007 | Jul 1, 2007 |
| Appeal | Jun 1, 2007 | |
| Public Hearing on RHNA Adoption | Sept 15, 2007 | |
| Proposed RTP Adoption | Dec 2007 | Dec 2007 |
| Local Housing Elements Due to State HCD | Jul 1, 2008 | Jul 1, 2008 |

¹ **CURRENTLY SCAG IS AT LEAST 6 MONTHS BEHIND SCHEDULE. THE RHNA FEE ISSUE IS STILL UNRESOLVED.**

² Statutory change is needed.

Funding RHNA

The RHNA funding issue is still unresolved at this time. The Regional Council authorized the sending of a letter to the State Housing and Community Development Department on March 3, 2006 requesting an extension of the RHNA due date of June 30, 2007 for up to two years to allow coordination with the new four year Regional Transportation Planning cycle and to allow the state legislature time to enact program changes, including identification and appropriation of state funding to support the RHNA and the adoption of a 20 year housing planning approach for communities.

Funding of this new coordinated transportation and housing process was also anticipated to be a shared expense between the California Blueprint growth visioning program and appropriate resources from the Commission on State Mandates. However, the commission on state mandates has ruled that SCAG is not an eligible claimant and thus may not seek reimbursement from the state for its RHNA costs.

The challenge ahead is to meet reform expectations in a timely manner that complies with statutory deadlines for both the RHNA and local housing element submission, while resolving the RHNA funding issue. The current housing statute calls for a RHNA fee on local governments to fund this state-mandated program. Imposing a fee on local government for RHNA is legally and politically uncertain. SCAG and ABAG have worked jointly on legislation AB 2307 (Mullin), which also includes a time extension to coordinate a longer (up to four year) Transportation Planning cycle and, potentially, a RHNA Pilot Program into state housing law and eliminates the RHNA fee authority. We have independently been working toward separate state budget appropriation to fund RHNA. The current statute and the proposed Pilot Program call for RHNA to be completed by June 30, 2007.

A funding estimate has been developed for the next RHNA. One estimate is for a RHNA based on our Pilot Program concept and the other is based on developing a RHNA under existing law. The resources for funding an integrated transportation, air quality and housing plan are: federal transportation funds, federal California Blueprint grant funds and State RHNA funds.

A concern we have with using Blueprint funding and federal transportation CPG funds is compliance with federal requirements and the added cost of local match. There is a 20% match in the case of Blueprint funds and 11.47% in the case of federal transportation dollars. State RHNA funds carry no match requirement nor are these funds burden with meeting federal transportation spending requirements.

Staff estimates that about \$550,000 of the existing Blueprint Compass grant money could be utilized since it funds tasks which are common to the RTP and RHNA. Because of this linkage we would be in compliance with federal requirements. However, approximately, \$187,000 of this amount is in second year funding for a trade, transfer and incentive plan for which we have not yet received a funding commitment. We would also have to provide a 20% match of approximately \$137,500 to support the \$550,000 Blueprint grant expenditure. We would also be matching our federal CPG funds.

Approximately, \$700, 000 in FY 2005-2007 overall work program resources is available and supports our growth forecast process for transportation/ air quality. Because of a streamlined process proposed in our proposed Pilot RHNA Program, staff estimates we would need approximately \$500,000 in state RHNA funds. If we are required to do the RHNA under existing law, the funding needed from the state rises to \$1 million. Consequently, the RHNA Pilot Program results in a \$500,000 cost savings as follows:

Pilot RHNA

| | |
|---------------------------|--------------------|
| FY 2005 - 2007 OWP funds: | \$700,000 |
| Blueprint Compass grant: | \$550,000 * |
| State RHNA funds | \$500,000 |
| Total | \$1,750,000 |

RHNA Under Existing Law

| | |
|---------------------------|--------------------|
| FY 2005 - 2007 OWP funds: | \$700,000 |
| Blueprint Compass grant: | \$550,000 * |
| State RHNA funds | \$1,000,000 |
| Total | \$2,250,000 |

*Approximately \$187,000 in uncommitted second year Blueprint funds

RHNA Funding Options

There are several options to make up the funding gap, including the following resources, either separately or in some combination:

- A new RHNA fee as allowed in current statute: SB 1102 (2004) - Allows a Fee to Distribute Regional Housing Need and SB 253 (2005) - Allows a Fee for Determining Regional Housing Needs
- Use of the SCAG General Fund
- Potential use of California Blueprint grant funds in the next funding cycle if approved by Caltrans
- Re-instatement of reimbursement eligibility from the Local State Mandate Commission
- Seek a state budget appropriation to fund RHNA activities

Appendix A: Regional Housing Needs Assessment Pilot Program Fact Sheet



Project Goal

The Pilot program provides the Southern California Association of Governments (SCAG) with the opportunity to undertake an alternate Regional Housing Needs Assessment Process (RHNA) which would demonstrate the viability of utilizing 20 year housing planning consistent with the Regional Transportation, Air Quality and the Regional Compass Blueprint growth vision.

Project Description

The current regional housing need allocation process as described in California Government section 65584 requires the compilation and coordination of numerous data sources, many of which are not broadly available, and which are not readily applicable to the task of allocating housing need to jurisdictions. The program also requires an overly strenuous public process with several interim program milestones each with a statutory deadline. The likely result of the current statutory process is a complex, costly, technical process that becomes separated from the broader, policy-based planning work performed by a region. The SCAG RHNA Pilot Program is based on the application of simple principles, on open policy dialogue and trade-offs, and in a way that supports long range regional planning, generally. It also more closely ties the growth forecast to the RTP/ Compass Blueprint in ways not envisioned by the AB 2158 RHNA law revision of 2004.

Products

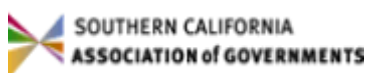
The allocation of housing would flow from the region's forecasting work. Local agencies would have the opportunity to make comments to the region based on technical factors listed in the current statute. A new process for engaging local governments in a trade and transfer process would add a policy element to the program, resulting in a Pilot 2007 Regional Housing Needs Assessment.

Cost

The costs are expected to be less than would be incurred for the current RHNA process. The proposal provides SCAG the opportunity to demonstrate a new methodology for the RHNA process that emphasizes subregional delegation, a longer range forecast for housing tied to transportation and air quality planning and extensive local input at the front end of the process. Currently, the Commission on State Mandates has ruled that ABAG and SCAG are not eligible to seek reimbursement for RHNA costs, SCAG and ABAG are pursuing legislation which would restore the ability to COGs to make a claim to the Commission for reimbursement and remove the RHNA fee based approach from the statute.

Who Benefits

SCAG has had discussions with the Secretary of Business Transportation and Housing regarding the goal that the program function based on application of simple principles, on open policy dialogue and trade-offs, and in a way that support regional planning, generally. The proposed Pilot Program would provide an opportunity to demonstrate that goal by greatly simplifying the technical and procedural requirements of the program, while at the same time, allowing local governments to see that their concerns are addressed.



Contact Person: Joseph Carreras, Project Manager, SCAG @
(213)236-1856